

JAP:SCF

UNITED STATES DISTRICT COURT  
EASTERN DISTRICT OF NEW YORK

**M 11-285**

- - - - -X

UNITED STATES OF AMERICA

- against -

AFFIDAVIT IN SUPPORT OF  
REMOVAL TO THE  
NORTHERN DISTRICT OF  
GEORGIA

SONYA MARTIN,

(Fed. R. Crim. P. 5(c))

Defendant.

- - - - -X

EASTERN DISTRICT OF NEW YORK, SS:

CHRISTOPHER COPE, being duly sworn, deposes and says that he is a Special Agent with the Federal Bureau of Investigation, duly appointed according to law and acting as such.

Upon information and belief, on March 11, 2011, an arrest warrant was issued by the United States District Court for the Northern District of Georgia commanding the arrest of the defendant SONYA MARTIN, pursuant to a Criminal Complaint charging her with Access Device Fraud in violation of Title 18, United States Code, Sections 1029(a)(2) and 1029(c)(1)(A)(i).

The source of your deponent's information and the grounds for his belief are as follows:

1. On March 11, 2011, an arrest warrant was issued by the United States District Court for the Northern District of Georgia, case number 1:11-MJ-388, commanding the arrest of the defendant SONYA MARTIN, pursuant to a Criminal Complaint charging her with Access Device Fraud in violation of Title 18, United

States Code, Sections 1029(a)(2) and 1029(c)(1)(A)(i). A copy of the arrest warrant and Criminal Complaint are attached hereto.

2. On March 17, 2011, the defendant arrived at John F. Kennedy International Airport ("JFK") in Queens, New York. The defendant had recently booked travel aboard Virgin Atlantic Airways and was scheduled to depart the United States for London, England at 7:05 p.m., aboard flight VS4.


3. Agents from the Federal Bureau of Investigation's New York Field Office were alerted to the defendant's travel plans, and to the existence of the pending arrest warrant, by agents from the FBI's Atlanta Field Office. Agents from the New York FBI office were also provided with a photograph of SONYA MARTIN.

4. At approximately, 4:30 p.m. on March 17, 2011, the defendant arrived at JFK to check-in for her scheduled flight. While she was at the airport ticket counter, FBI agents approached the defendant and asked whether she was SONYA MARTIN. The defendant responded that she was. FBI agents also questioned the airline reservation employee who was checking-in the defendant. The reservation employee confirmed that the individual standing before them had presented herself as SONYA MARTIN. Agents were also able to determine that the individual who indicated she was SONYA MARTIN appeared to match the individual depicted in the photograph provided by FBI agents in Atlanta.

5. It is the desire of the United States Attorney for

the Northern District of Georgia that the defendant SONYA MARTIN be removed to that district for prosecution.

WHEREFORE, it is requested that the defendant SONYA MARTIN be removed to the Northern District of Georgia so that she may be dealt with according to law.

  
\_\_\_\_\_  
Christopher Cope  
Special Agent  
FBI

Sworn to before me this  
18<sup>th</sup> day of March, 2011

-  
DGE  
K

UNITED STATES DISTRICT COURT  
NORTHERN DISTRICT OF GEORGIA

UNITED STATES OF AMERICA

WARRANT FOR ARREST

VS

Case No.: 1:11-MJ-388

SONYA MARTIN

To: The United States Marshal  
and any Authorized United States Officer

YOU ARE HEREBY COMMANDED to arrest SONYA MARTIN

and bring him or her forthwith to the nearest magistrate to answer a COMPLAINT

charging him or her with (brief description of offense):

traffic in and use at least one unauthorized access device during any one-year period, and by such conduct obtain in aggregate at least \$1,000 during that period, such trafficking and use in or affecting interstate and foreign commerce

in violation of Title 18, United States Code, Section(s) 1029(a)(2) and 1029(c)(1)(A)(i)

C. Christopher Hagy

Name of Issuing Officer

Signature of Issuing Officer

United States Magistrate Judge

Title of Issuing Officer

March 11, 2011 at Atlanta, GA

Date and Location

Bail Fixed at \$

by

Name of Judicial Officer

## RETURN

This warrant was received and executed with the arrest of the above-named defendant at:

JFK INTERNATIONAL AIRPORT, QUEENS, NY

Date Received:

3/14/2011

CHRISTOPHER J. CALE

Name and Title of Arresting Officer

Date of Arrest:

3/17/2011

Signature of Arresting Officer

United States District Court **FILED IN CHAMBERS**  
U.S.D.C. Atlanta

NORTHERN DISTRICT OF GEORGIA

MAR 11 2011

UNITED STATES OF AMERICA

v.

JAMES N. HATTEN, Clerk

CRIMINAL COMPLAINT **By: [Signature]** Deputy Clerk

SONYA MARTIN

CASE NUMBER: 1:11-MJ-388

(Name and Address of Defendant)

I, the undersigned complainant being duly sworn state the following is true and correct to the best of my knowledge and belief. On or about November 8, 2008 in Fulton County, in the Northern District of Georgia defendant(s) did,

traffic in and use at least one unauthorized access device during any one-year period, and by such conduct obtain in aggregate at least \$1,000 during that period, such trafficking and use in or affecting interstate and foreign commerce

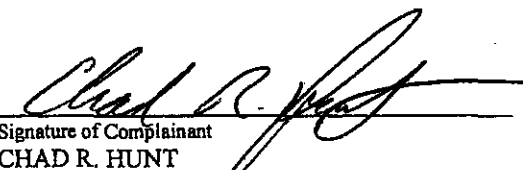
in violation of Title 18 United States Code, Section(s) 1029(a)(2) and 1029(c)(1)(A)(i).

I further state that I am a(n) Special Agent with the Federal Bureau of Investigation and that this complaint is based on the following facts:

SEE AFFIDAVIT

Continued on the attached sheet and made a part hereof.

(x) Yes ( ) No

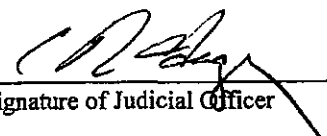
  
Signature of Complainant  
CHAD R. HUNT

Based upon this complaint, this Court finds that there is probable cause to believe that an offense has been committed and that the defendant has committed it. Sworn to before me, and subscribed in my presence

March 11, 2011 at \_\_\_\_\_  
Date

Atlanta, Georgia  
City and State

C. Christopher Hagy  
United States Magistrate Judge  
Name and Title of Judicial Officer  
AUSA Lawrence R. Sommerfeld

  
Signature of Judicial Officer

**AFFIDAVIT IN SUPPORT OF COMPLAINT**

I, Chad R. Hunt, being duly sworn, hereby depose and state as follows:

1. I am a Special Agent with the Federal Bureau of Investigation (FBI) assigned to the Atlanta Field Office. I am an investigative or law enforcement officer of the United States within the meaning of Title 18, United States Code, Section 2510(7), as a Special Agent of the FBI. As such, I am empowered to conduct investigations of and to make arrests for felony offenses such as those in this case. I have been employed as a Special Agent with the FBI since 2004 and my current duties include the full-time investigation of computer crimes. As such, I have participated in numerous investigations involving computer and high technology crimes including computer intrusions, Internet fraud, and credit card fraud. I have also received training in the area of computer crimes. Prior to joining law enforcement I was employed in the technology industry for 12 years. During my law enforcement career, I have written or executed numerous search, seizure, and arrest warrants pertaining to the seizure of criminal evidence such as computers, digital storage media, financial records, fraud proceeds, and

evidence of other types of crimes.

2. This affidavit is made in support of a complaint against and arrest warrant for SONYA MARTIN for trafficking in or using at least one unauthorized access device during any one-year period, and by such conduct obtaining in aggregate at least \$1,000 during that period, such trafficking or use in or affecting interstate and foreign commerce, in violation of Title 18, United States Code, Section 1029(a)(2) and 1029(c)(1)(A)(i).
3. The facts set forth in this affidavit are based upon my personal observations, my training and experience, and information obtained from various law enforcement agents and witnesses. This affidavit is intended to show merely that there is sufficient probable cause for the requested complaint and arrest warrant and does not purport to set forth all of my knowledge of or investigation into this matter. Unless specifically indicated otherwise, all conversations and statements described in this affidavit are related in substance and in part only.
4. On November 12, 2008, RBS WorldPay (RBSWP), headquartered in or around Atlanta, Georgia, which was at the time the credit card processing division of the Royal Bank of Scotland, contacted the

FBI regarding a computer intrusion and fraud scheme.

Representatives of RBSWP provided the following information:

5. On November 8, 2008, a group of computer hackers, in conjunction with an organized international group of “cashers” and “carders” (defined below), executed a highly coordinated scheme to defraud RBSWP. The group of hackers gained unauthorized access to RBSWP computer systems, also located in or around Atlanta, and acquired data, including debit card account information, from the network. After collecting the necessary data, the hackers used sophisticated techniques to identify the PIN codes and modify the account information associated with pre-paid payroll debit card accounts.<sup>1</sup> Specifically, the hackers increased the account balances available on certain of the fraudulently-obtained debit card accounts. With the balances of the debit card accounts increased, the hackers coordinated with multiple people around the world to withdraw large amounts of money from ATM

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<sup>1</sup> Prepaid payroll cards are debit cards funded through direct deposits from card holders' employers. Prepaid payroll cards allow employers to pay their employees through direct deposits to prepaid payroll card accounts, instead of using paychecks or direct deposits into employees' bank accounts. Cash may be withdrawn by presenting the prepaid payroll card to an automated teller machine (ATM) and entering the card's PIN code. Prepaid payroll cards may also be used to purchase goods and services from participating merchants. Transactions associated with these cards are processed by RBSWP on behalf of its client financial institutions.



terminals. The individuals who made duplicate debit cards using the unlawfully obtained RBSWP debit card account information are referred to as "carders" and the individuals who then took the fraudulent RBSWP debit cards to ATM terminals throughout the world and withdrew funds are referred to as "cashers".

6. Using the unlawfully obtained debit card account numbers, the group completed more than 15,000 transactions at over 2,100 ATM terminals in at least 280 cities worldwide. As a result of this unlawful activity, the scheme defrauded RBSWP of more than US\$9.4 million in less than twelve hours on or about November 8, 2008.
7. According to representatives of RBSWP, each of the fraudulent transactions was debited on prepaid payroll debit card accounts on the RBS WorldPay computer system located in the Northern District of Georgia.
8. According to the records provided by RBSWP, account number XXXXXXXXXXXXX7662 (all but last four digits redacted to preserve confidentiality) listed over 1,800 transactions from ATM terminals for a total amount withdrawn of over one million dollars on November 8, 2008. Further review of the records indicated that

approximately 166 fraudulent transactions were completed in and around the area of Chicago, Illinois resulting in the withdrawal of approximately \$89,120. The following transactions were included in the records:

ATM Location: 4411 LINCOLN HWY, MATTESON, IL

ATM Transactions:

<u>Date/Time</u>	<u>Withdrawal</u>
2008-11-08 01:18:49.000	\$603.00
2008-11-08 01:19:46.000	\$603.00
2008-11-08 01:20:38.000	\$603.00
2008-11-08 01:21:29.000	\$603.00
2008-11-08 01:31:52.000	\$403.00
2008-11-08 01:32:51.000	\$803.00
2008-11-08 01:34:08.000	\$803.00
2008-11-08 01:35:09.000	\$803.00
2008-11-08 01:40:13.000	\$603.00
2008-11-08 01:41:02.000	\$603.00
2008-11-08 01:41:48.000	\$603.00
2008-11-08 01:59:23.000	\$803.00
2008-11-08 02:00:24.000	\$803.00
2008-11-08 02:02:03.000	\$203.00
2008-11-08 02:02:54.000	\$403.00

ATM Location: 3340 W ROOSEVELT, CHICAGO, IL

ATM Transactions:

<u>Date/Time</u>	<u>Withdrawal</u>
2008-11-08 03:57:10.000	503.00
2008-11-08 03:58:10.000	503.00
2008-11-08 03:59:05.000	503.00
2008-11-08 03:59:59.000	503.00
2008-11-08 04:01:11.000	0.00
2008-11-08 04:02:09.000	503.00
2008-11-08 04:03:46.000	603.00
2008-11-08 04:04:36.000	0.00

2008-11-08 04:05:31.0000.00  
 2008-11-08 04:06:16.000503.00  
 2008-11-08 04:07:15.000503.00  
 2008-11-08 04:08:15.000503.00  
 2008-11-08 04:09:03.000503.00  
 2008-11-08 04:09:44.0000.00  
 2008-11-08 04:10:30.000503.00  
 2008-11-08 04:11:22.000503.00  
 2008-11-08 04:12:43.000503.00  
 2008-11-08 04:13:35.000503.00

ATM Location: 370 E 162ND ST, S HOLLAND, IL  
 ATM Transactions:

<u>Date/Time</u>	<u>Withdrawal</u>
2008-11-08 04:18:50.000	\$603.00
2008-11-08 04:19:49.000	\$603.00
2008-11-08 04:20:32.000	\$603.00
2008-11-08 04:21:17.000	\$603.00
2008-11-08 04:21:58.000	\$603.00
2008-11-08 04:33:00.000	\$803.00
2008-11-08 04:34:02.000	\$803.00
2008-11-08 04:35:11.000	\$803.00
2008-11-08 04:36:21.000	\$803.00
2008-11-08 04:37:21.000	\$803.00

9. After identifying the transactions in Illinois, the FBI collected multiple surveillance photographs from ATM terminals including images from some of the transactions listed above. Using these photographs, the FBI released information to local Chicago news stations and received information on two individuals, who the FBI later learned were boyfriend and girlfriend.

10. On April 22, 2009, the boyfriend was interviewed by the FBI under the terms of a proffer agreement with the U.S. Attorney's Office for the Northern District of Georgia. During the interview, he admitted that he and his girlfriend withdrew funds from a National City Bank ATM terminal using cards provided by the girlfriend's cousin, SONYA MARTIN. He explained that SONYA MARTIN provided two cards to his girlfriend to be used to withdraw funds from ATMs. He estimated that he and his girlfriend withdrew approximately \$20,000 to \$25,000 from multiple ATMs in the area. He noted that he had known MARTIN for approximately three years. However, MARTIN did not trust him.

11. The boyfriend was shown two photographs from an ATM surveillance camera from November 8, 2008. He identified the individual in the photographs as SONYA MARTIN. Copies of the photographs initialed by the boyfriend are attached as ATTACHMENT A.

12. On April 22, 2009, the girlfriend was interviewed by the FBI under the terms of a proffer agreement with the U.S. Attorney's Office for the Northern District of Georgia. During the interview, she

admitted that she and her boyfriend withdrew funds from ATM terminals using cards provided by SONYA MARTIN.

13. The girlfriend explained that MARTIN contacted her on the night of the cash withdrawals. MARTIN arrived at her apartment and provided the cards and PIN codes for her and her boyfriend to withdraw funds from ATMs. MARTIN instructed her to return the withdrawn funds and receipts. She and her boyfriend then drove around the area of her residence to multiple ATM terminals and withdrew funds in the approximate amount of \$500 per transaction.

14. After withdrawing approximately \$20,000, she and her boyfriend drove to MARTIN's hotel to return the funds and receipts to MARTIN. The girlfriend took the money she and her boyfriend had withdrawn to MARTIN, at her hotel room. MARTIN did not want the boyfriend to come into the hotel room because she did not trust him. While in the hotel room, the girlfriend observed stacks of cash, mostly in \$20 bills, around the room. She estimated that MARTIN had approximately \$50,000 in the room. MARTIN paid her and her boyfriend \$500 each for withdrawing the funds.

15. The girlfriend was shown a photograph from an ATM surveillance camera from November 8, 2008. She identified the individual in

the photograph as SONYA MARTIN. A copy of the photograph initialed by the girlfriend is attached as Attachment B.

16. According to statements from both individuals, SONYA MARTIN frequently travels between London and Africa. The girlfriend explained that SONYA MARTIN lived in Africa with her Nigerian husband.

17. The proffer letter given to both the boyfriend and girlfriend stated that so long as they were completely truthful, the information they provided during their interviews would not be used against them. The proffer letter provided for a number of exceptions, including that if they were untruthful, the information could be used against them. Though the individuals being interviewed provided information in the hopes of receiving a benefit, the proffer letter provided, and it was explained to the individuals, that no promises were being made in exchange for the information they were providing.

18. Both the boyfriend and girlfriend have criminal histories. The girlfriend's NCIC record shows arrests for vehicle offenses (speeding, driving on a suspended/revoked license, operating a vehicle without insurance) in 2007 and 2008 and a child

endangerment conviction, for which she received a sentence of 12 months supervision, during 2006. The boyfriend's NCIC record shows a conviction in 1990 for attempted possession with intent to distribute cocaine, for which he received 30 months probation, and, in 2002, a conviction on federal charges of conspiracy to commit money laundering, for which he received 41 months "VNV" and two years supervised release. The NCIC record also shows that he was arrested in 1981 and 1988 for unlawful weapons and vehicle charges, and in 2000 for money laundering. The 1981 charges were dismissed, but no disposition is listed for the other charges.

19. On October 15, 2009, a woman with initials J.M., SONYA MARTIN's sister, was interviewed by the FBI. J.M. explained that SONYA MARTIN left Chicago and moved to London with her husband. J.M. also explained that she had a business-related falling out with her sister, SONYA MARTIN.

20. J.M. was shown a photograph from an ATM surveillance camera from November 8, 2008. J.M. identified her sister, SONYA MARTIN, as the individual in the photograph. A copy of the photograph initialed by J.M. is attached as ATTACHMENT C.

21. ATTACHMENT D shows ATM transactions from ATMs located at 370 E 162ND ST S HOLLAND, IL and 4411 LINCOLN HWY, MATTESON, IL. ATM surveillance photographs from these ATMs are also included. The individual shown in Photo 3 from ATTACHMENT D was identified by all three individuals (i.e., the boyfriend, girlfriend, and J.M.) as being SONYA MARTIN. The boyfriend identified the individual in Photo 1 from ATTACHMENT D as being SONYA MARTIN.

22. Based on the foregoing, I believe that there is probable cause to believe that SONYA MARTIN trafficked in or used at least one unauthorized access device during any one-year period, and by such conduct obtained in aggregate at least \$1,000 during that period, such trafficking or use in or affecting interstate and foreign commerce, in violation of Title 18, United States Code, Section 1029(a)(2) and 1029(c)(1)(A)(i)



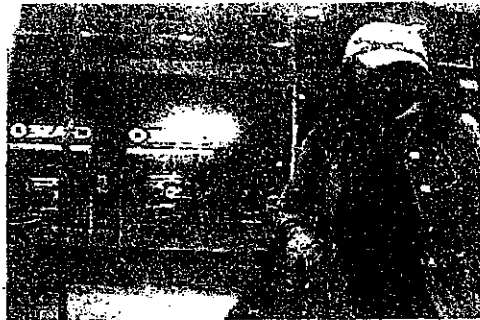
ATTACHMENT A  
BOYFRIEND INITIALED PHOTOS



FEDERAL BUREAU OF INVESTIGATION  
Atlanta Division

DVR Video Snapshot

3.3 ATM #2 Transaction : IL South Park Ave South Holland 370 E 162nd St  
Sat, Nov 08, 2008, 4:32:39 AM (Central Standard Time)  
Event: No event selected



Video Capture Size: 352 x 240 pixels  
Time of snapshot: 11/8/2008 4:32:39 AM (Central Standard Time)  
Media Input Name: 3.3 ATM #2 Transaction  
DVR Location: IL South Park Ave South Holland 370 E 162nd St  
DVR Serial #: KBAAW8244-4310B  
DVR Station ID: 3474

*Sonya Martin J79 4/24/2009*

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**FEDERAL BUREAU OF INVESTIGATION**  
Atlanta Division

DVR Video Snapshot

4.3 WU ATM Internal: IL Lincoln Mall #1 4411 W 211th St  
Sat, Nov 08, 2008, 1:34:54 AM (Central Standard Time)  
Event: No event selected



Video Capture Size: 352x240 pixels  
Time of snapshot: 11/8/2008 1:34:53 AM (Central Standard Time)  
(11/8/2008 1:34:53 AM (Central Standard Time))

SONYA MARTIN JFJ 4/22/2009

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ATTACHMENT B

GIRLFRIEND INITIALED PHOTO



FEDERAL BUREAU OF INVESTIGATION  
Atlanta Division

DVR Video Snapshot

4.3 WU ATM Internal: IL Lincoln Mall #1 4411 W 211th St  
Sat, Nov 08, 2008, 1:34:54 AM (Central Standard Time)  
Event: No event selected



Video Capture Size: 352x240 pixels  
Time of snapshot: 11/8/2008 1:34:53 AM (Central Standard Time)  
(11/8/2008 1:34:53 AM (Central Standard Time))

SonyA Martin

4-22-09 ap

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ATTACHMENT C

J.M. INITIALED PHOTO



Sonyia Martin  
10/15/09 Cjm

ATTACHMENT D

SONYA MARTIN TRANSACTIONS:

CHASE	370 E 162ND ST	S HOLLAND	IL	IL0092
2008-11-08 04:33:00.000	803.00			
2008-11-08 04:34:02.000	803.00			
2008-11-08 04:35:11.000	803.00			
2008-11-08 04:36:21.000	803.00			
2008-11-08 04:37:21.000	803.00			

DVR Video Snapshot

3.3 ATM #2 Transaction: IL South Park Ave South Holland 370 E 162nd St  
Sat, Nov 08, 2008, 4:32:39 AM (Central Standard Time)  
Event: No event selected



Video Capture Size: 352 x 240 pixels  
Time of snapshot: 11/8/2008 4:32:39 AM (Central Standard Time)  
Media Input Name: 3.3 ATM #2 Transaction  
DVR Location: IL South Park Ave South Holland 370 E 162nd St  
DVR Serial #: KBAAW6244-4310B  
DVR Station ID: 3474

Photo 1.

CHASE 4411 LINCOLN HWY MATTESON IL IL0090

2008-11-08 01:31:52.000 403.00  
2008-11-08 01:32:51.000 803.00  
2008-11-08 01:34:08.000 803.00  
2008-11-08 01:35:09.000 803.00

2008-11-08 01:59:23.000 803.00  
2008-11-08 02:00:24.000 803.00  
2008-11-08 02:02:03.000 203.00  
2008-11-08 02:02:54.000 403.00

DVR Video Snapshot

4.3 WU ATM Internal: IL Lincoln Mall #1 4411 W 211th St  
Sat, Nov 08, 2008, 1:31:56 AM (Central Standard Time)  
Event: No event selected



Video Capture Size: 352x240 pixels  
Time of snapshot: 11/8/2008 1:31:56 AM (Central Standard Time)  
(11/8/2008 1:31:56 AM (Central Standard Time))

Photo 2.

DVR Video Snapshot

4.3 WU ATM Internal: IL Lincoln Mall #1 4411 W 211th St  
Sat, Nov 08, 2008, 1:34:54 AM (Central Standard Time)  
Event: No event selected



Video Capture Size: 352x240 pixels  
Time of snapshot: 11/8/2008 1:34:53 AM (Central Standard Time)  
(11/8/2008 1:34:53 AM (Central Standard Time))

Photo 3.

DVR Video Snapshot

4.3 WU ATM Internal : IL Lincoln Mall #1 4411 W 211th St  
Sat, Nov 08, 2008, 1:35:16 AM (Central Standard Time)  
Event: No event selected



Video Capture Size: 352x240 pixels  
Time of snapshot: 11/8/2008 1:35:15 AM (Central Standard Time)  
(11/8/2008 1:35:15 AM (Central Standard Time))

Photo 4.

DVR Video Snapshot

4.3 WU ATM Internal : IL Lincoln Mall #1 4411 W 211th St  
Sat, Nov 08, 2008, 2:00:08 AM (Central Standard Time)  
Event: No event selected



Video Capture Size: 352x240 pixels  
Time of snapshot: 11/8/2008 2:00:08 AM (Central Standard Time)  
(11/8/2008 2:00:08 AM (Central Standard Time))

Photo 5.

**DVR Video Snapshot**

4.3 YWU ATM Internal : IL Lincoln Mall #1 4411 W 211th St  
Sat, Nov 08, 2008, 2:02:13 AM (Central Standard Time)  
Event: No event selected



Video Capture Size: 352x240 pixels  
Time of snapshot 11/8/2008 2:02:12 AM (Central Standard Time)  
(11/8/2008 2:02:12 AM (Central Standard Time))

Photo 6.